

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

EMMANUEL THIERSAINT,

Plaintiff,

v.

DEPARTMENT OF HOMELAND  
SECURITY; U.S. IMMIGRATION AND  
CUSTOMS ENFORCEMENT;  
WILLIAM CHAMBERS, in his individual  
capacity; JOHN DOE DEFENDANTS 1-10,  
unknown ICE Agents, in their individual  
capacities; SUFFOLK COUNTY  
SHERIFF'S DEPARTMENT; JOHN DOE  
DEFENDANTS 11-16,  
unknown officers of the Suffolk County  
Sheriff's Department, in their individual  
capacities; and UNITED STATES OF  
AMERICA,

Defendants.

Civil Action No. 18-12406-DJC

**THIRD JOINT MOTION FOR STAY OF THE CASE**

On January 3, 2024, this Court entered an Electronic Order requiring counsel for the parties to confer and to file a joint statement by January 17, 2024, proposing a schedule for the remainder of the above-captioned action. (Doc. No. 228). On January 10, 2024, counsel for the parties conferred pursuant to this Court's Order, and jointly requested that this Court enter a stay of this case for a period of thirty (30) days, to February 16, 2024, which this Court allowed. (Doc. No. 230). On February 14, 2024, counsel for the parties jointly requested a second stay of this case for a period of forty-five (45) days, to April 1, 2024, which this Court also allowed. (Doc. No. 232). The parties acknowledge that the Court cautioned that it "does not anticipate further extensions of this date." *Id.*

The parties are now in active discussions, have exchanged offers and counteroffers, and have significantly narrowed the difference in their respective positions. Accordingly, and recognizing the Court's prior cautionary words, the parties jointly request that this Court continue a stay of the case for an additional 30 days to allow them to continue to confer in an effort to determine whether resolution of this case is possible without the need for further litigation.

WHEREFORE, for these reasons, the parties respectfully request this Court allow their motion to stay this case for a period of 30 days, to May 1, 2024.

**[signatures on following page]**

Respectfully submitted,

**PLAINTIFF EMMANUEL THIERSAINT**

By his attorneys,

**DEFENDANT UNITED STATES OF  
AMERICA**

JOSHUA S. LEVY

Acting United States Attorney

/s/Michael Wishnie

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**CERTIFICATE OF SERVICE**

I, Michael J. Wishnie, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/Michael Wishnie

Michael J. Wishnie

Yale Law School

Dated: March 29, 2024

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<sup>1</sup> Electronically signed and filed with consent provided by e-mail on March 29, 2024.